

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Plaintiff,

vs.

Civil Action No. 04 - 192E

REAL PROPERTY KNOWN AND
NUMBERED AS 12171 BLAIR STREET,
CONNEAUT LAKE, PENNSYLVANIA
16316, including all improvements,
fixtures, and appurtenances
thereto or therein,

Defendant

**JOINT MOTION TO ESTABLISH DISCOVERY PERIOD
AND TO CONTINUE HEARING SCHEDULED FOR MARCH 22, 2006**

AND NOW come the United States of America, Khang Nguyen and Tu L. Nguyen, by and through their respective counsel, and respectively represent as follows:

1. The parties will have until May 31, 2006, within which to conduct discovery and settlement negotiations.
2. The hearing scheduled for March 22, 2006 is continued until further Order of Court.
3. Upon expiration of the discovery period, the parties shall report to the court on the status of their discovery and settlement negotiations, at which time a hearing will be rescheduled if necessary.
4. This Stipulation is subject to the approval of the Court.

WHEREFORE, the United States of America, Khang Nguyen and Tu L. Nguyen respectfully request that this Honorable Court order that the parties have until May 31, 2006, within which to conduct discovery.

Mary Beth Buchanan
United States Attorney

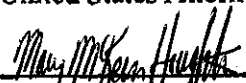
By: s/Mary McKeen Houghton
Assistant U.S. Attorney
Suite 4000, U.S. Courthouse
700 Grant Street
Pittsburgh, PA 15219
(412) 894-7370
PA ID #31929

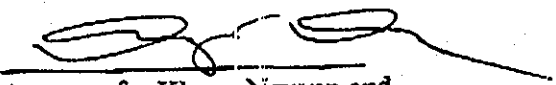
s/Gary E. Gerson
Attorney for Khang Nguyen and
Tu L. Nguyen

WHEREFORE, the United States of America, Khang Nguyen and Tu L. Nguyen respectfully request that this Honorable Court order that the parties have until May 31, 2006, within which to conduct discovery.

Mary Beth Buchanan
United States Attorney

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Attorney for Khang Nguyen and
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